

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:)	Chapter 11
)	
REVERSE MORTGAGE INVESTMENT)	Case No. 22-11225 (MFW)
TRUST INC., <i>et al.</i> ¹)	
)	(Jointly Administered)
)	
Debtors.)	Related Docket No. 235
)	

**SUPPLEMENTAL DECLARATION OF TANYA MEEROVICH
IN SUPPORT OF THE DEBTORS' APPLICATION FOR ENTRY OF
AN ORDER (I) AUTHORIZING THE DEBTORS TO EMPLOY AND RETAIN
FTI CONSULTING, INC. TO PROVIDE THE DEBTORS A CHIEF RESTRUCTURING
OFFICER AND CERTAIN ADDITIONAL PERSONNEL, (II) DESIGNATING
TANYA MEEROVICH AS CHIEF RESTRUCTURING OFFICER FOR THE DEBTORS
EFFECTIVE AS OF THE PETITION DATE, AND (III) GRANTING RELATED RELIEF**

Pursuant to 28 U.S.C. § 1746, Tanya Meerovich declares as follows:

1. I am a Senior Managing Director with FTI Consulting, Inc. (together with its wholly owned subsidiaries, “FTI”). I submit this declaration (the “Supplemental Declaration”) to supplement my original declaration [D.I. 235-2] (the “Original Declaration”) submitted in support of, and annexed to, the *Debtors’ Application for Entry of an Order (I) Authorizing the Debtors to Employ and Retain FTI Consulting, Inc. to Provide the Debtors a Chief Restructuring Officer and Certain Additional Personnel, (II) Designate Tanya Meerovich as Chief Restructuring Officer for the Debtors Effective as of the Petition Date, and (III) Granting Related Relief* [D.I. 235] (the “Application”) filed by the debtors and debtors in possession in the above-captioned chapter 11

¹ The Debtors in these jointly administered chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, include: Reverse Mortgage Investment Trust Inc. (3421); Reverse Mortgage Funding LLC (0209); RMIT Cash Management LLC (6241); RMIT Operating I LLC (1844); and RMIT Operating II LLC (2301). The location of the Debtors’ service address for purposes of these chapter 11 cases is: 1455 Broad Street, 2nd Floor, Bloomfield, NJ 07003.

cases (the “Debtors”). This Supplemental Declaration does not replace anything in the Application or the Original Declaration except as expressly set forth herein. Except as otherwise noted, I have personal knowledge of the facts set forth herein.² Capitalized terms used in this Supplemental Declaration not otherwise defined have the meaning given to them in the Original Declaration.

SUPPLEMENTAL DISCLOSURES

2. After filing the Application, FTI received requests for additional information from the Office of the U.S. Trustee. In response to these inquiries, FTI provides the following additional disclosures:

- a) Paragraph thirteen (¶ 13) of the Application provides that Additional Personnel services may be provided by FTI or its subsidiaries. FTI discloses that professionals from subsidiary FTI Consulting (SC) Inc. are being utilized as Additional Personnel to assist the Debtors in strategic communications with employees, borrowers, vendors, media, and other key stakeholders in efforts to stabilize the business and maximize enterprise value during these chapter 11 proceedings. For the avoidance of doubt, FTI’s computer database search of recent and former clients³ and the disclosures set forth in the Original Declaration included all of FTI’s wholly-owned subsidiaries globally, including FTI Consulting (SC) Inc.
- b) As set forth on Exhibit 2 to the Original Declaration, Starwood Capital Group (“Starwood Capital”) is a current FTI client on matters unrelated to the Debtors or their chapter 11 cases. More specifically, FTI provides tax advisory, compliance, and return preparation services for Starwood Capital and certain of its affiliates, none of whom are the Debtors or their affiliates. In addition, FTI subsidiary, Compass Lexecon, LLC formerly provided economic consulting to Starwood Capital on matters unrelated to the Debtors or their chapter 11 cases.
- c) As set forth on Exhibit 2 to the Original Declaration, U.S. Bank, N.A., Credit Suisse First Boston Mortgage Capital LLC, Credit Suisse Securities (USA) LLC, and Deutsche Bank National Trust Company are current FTI clients in matters unrelated to the Debtors or their chapter 11 cases. Certain matters on behalf of these entities involve the mortgage industry.

² Certain of the disclosures herein relate to matters within the personal knowledge of other professionals at FTI and are based on information provided by them.

³ See Original Decl. ¶ 6, at FN 4.

3. In connection with the preparation of this Supplemental Declaration, FTI conducted a review of additional parties in interest of the Debtors related to additional contract counterparties and Debtor and estate professionals. A listing of the parties reviewed is reflected on Exhibit 1 to this Supplemental Declaration. FTI's review, completed under my supervision, consisted of a query of Exhibit 1 parties within an internal computer database⁴ containing names of individuals and entities that are present or recent former clients of FTI. A summary of such relationships that FTI identified during this process is set forth on Exhibit 2 to this Supplemental Declaration.

4. Based on the results of its review, except as otherwise discussed herein, FTI does not have a relationship with any of the parties on Exhibit 1 in matters related to the Debtors or the Cases. FTI has provided and could reasonably be expected to continue to provide services unrelated to the Debtors or the Cases for the various entities shown on Exhibit 2. FTI's assistance to these parties has been related to providing various financial restructuring, litigation support, technology, strategic communications, and economic consulting services. To the best of my knowledge and except as otherwise disclosed herein, no services have been provided to these parties in interest that involve their rights in the Cases, nor does FTI's involvement in the Cases compromise its ability to continue such consulting services.

5. As set forth in the Original Declaration, it is FTI's policy and intent to update and expand its ongoing relationship search for additional parties in interest. If any new material relevant facts or relationships are discovered or arise, FTI will file a supplemental declaration pursuant to Bankruptcy Rule 2014(a).

I declare under penalty of perjury that the foregoing is true and correct.

⁴ For the avoidance of doubt, FTI's computer database covers FTI Consulting, Inc. and its wholly-owned subsidiaries globally.

Executed on December 30, 2022

/s/ *Tanya Meerovich*

Tanya Meerovich
FTI Consulting, Inc.